

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

L.W., by and through her parents and next friends, )  
Samantha Williams and Brian Williams, et al. )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
JONATHAN SKRMETTI, in his official capacity )  
as the Tennessee Attorney General and Reporter, et )  
al., )  
 )  
Defendants. )  
 )

**DEFENDANTS' NOTICE OF FILING**

Defendants Jonathan Skrmetti, in his official capacity as Tennessee Attorney General and Reporter, Tennessee Department of Health (“TDH”), Ralph Alvarado, in his official capacity as Commissioner of TDH, Tennessee Board of Medical Examiners (“BME”), Melanie Blake, in her official capacity as President of BME, Stephen Lloyd, in his official capacity as Vice President of BME, Randall E. Pearson, Phyllis E. Miller, Samantha McLerran, Keith G. Anderson, Deborah Christiansen, John W. Hale, John J. McGraw, Robert Ellis, James Diaz-Barriga, and Jennifer Claxton, all in their official capacities as members of BME, and Logan Grant, in his official capacity as Executive Director of the Tennessee Health Facilities Commission (collectively “Defendants”) file the attached documents in support of their Response in Opposition to Plaintiffs’ Motion for Preliminary Injunction:

Exhibit 1      Records regarding Vanderbilt University Medical Center  
The exhibit is comprised of the following subparts:

- A. Kruesi, K., *Social media posts spark calls to investigate Tenn. 's VUMC*, Associate Press, September 21, 2022, <https://apnews.com/article/health-social-media-tennessee-nashville-730906b47882692645463fe9546a8695>;
- B. Brady, C., Cypherski, M., Romano, M., *PATH to Affirmative Medical Care for Transgender/Gender Diverse (TGD) Youth*, previously available at [www.youtube.com/%20watch?v=HzLYai7QQ0A](https://www.youtube.com/%20watch?v=HzLYai7QQ0A)<sup>1</sup>;
- C. Brady, C., Cypherski, M., Romano, M., *PATH to Affirmative Medical Care for Transgender/Gender Diverse (TGD) Youth*, presentation dated July 14, 2021, [www.seaetc.com/wp-content/uploads/2021/07/20210714-PATH-to-Affirmative-Medical-Care-for-Transgender-gender-Diverse-TDG-Youth.pdf](https://www.seaetc.com/wp-content/uploads/2021/07/20210714-PATH-to-Affirmative-Medical-Care-for-Transgender-gender-Diverse-TDG-Youth.pdf);
- D. Video of Shayne Sebold Taylor, M.D., Medicine Grand Rounds lecture, 2018, <https://twitter.com/%20MattWalshBlog/status/1572313523232931840>;
- E. Video of Ellen W. Clayton, M.D., <https://twitter.com/%20MattWalshBlog/status/1572313566589468672>;
- F. Taylor, Shayne S., *A Primer for Transgender Health*, Southeast/TN AIDS Education and Training Center, January 1, 2019, [www.seaetc.com/wp-content/uploads/2019/01/A-Primer-for-Transgender-Health.pdf](https://www.seaetc.com/wp-content/uploads/2019/01/A-Primer-for-Transgender-Health.pdf);
- G. Taylor, Shayne S., *Caring for the Transgender Patient: With little evidence; but a lot of love*, <https://slidespiel.com/view/gepy>;
- H. Declaration of Shayne Sebold Taylor, MD, filed in *Bongo Productions, LLC et al. v. Carter Lawrence et al.*, No. 3:21-cv-00490 [Doc. No. 7-3];
- I. Robbins Plastic Surgery, Before-and-After Photographs, obtained through digital archive [www.wayback.archive.org](http://www.wayback.archive.org);
- J. Declaration of C. Wright Pinson, MBA, MD
- K. Declaration of Cassandra C. Brady, MD; and
- L. VUMC letter to Honorable Representative Jason Zachary, October 7, 2020.

Exhibit 2 Landén et al., *A systematic review of hormone treatment for children with gender dysphoria and recommendations for research*, *Acta Paediatrica*, 2023;00:1,12 (April 18, 2023).

Exhibit 3 Expert Declaration of James Cantor, PhD with Curriculum Vitae

Exhibit 4 Expert Declaration of Paul W. Hruz, M.D., PH.D with Curriculum Vitae

Exhibit 5 Expert Declaration of Stephen B. Levine, M.D. with Curriculum Vitae

Exhibit 6 Expert Declaration of Dr. Sven Román with Curriculum Vitae

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<sup>1</sup> \* Video exhibit filed in-person pursuant to Administrative Order No. 205 and provided to counsels of record via an online file sharing platform.

Exhibit 7 Expert Declaration of Michael K. Laidlaw, MD. with Curriculum Vitae  
(FILED UNDER SEAL)

Exhibit 8 Expert Declaration of Geeta Nangia, M.D. with Curriculum Vitae

Exhibit 9 Coleman, E., Radix, A. E., Bouman, W. P., et al., *Standards of Care for the Health of Transgender and Gender Diverse People*, Version 8, International Journal of Transgender Health, 23:sup1, S1-S259, DOI: 10.1080/26895269.2022.2100644

Exhibit 10 Hembree, W. C., et al., *Endocrine Treatment of Gender-Dysphoric / Gender-Incongruent Persons: An Endocrine Society\* Clinical Practice Guideline*, J. Clin Endocrinol Metab, November 2017, 102(11):3869-3903, DOI: 10.1210/c.2017-01658

Exhibit 11 Declaration of Chloe Cole

Exhibit 12 Declaration of Helena Kerschner

Exhibit 13 Declaration of Prisha Mosley

Exhibit 14 Declaration of Barbara F.

Exhibit 15 Declaration of John Stiles

Exhibit 16 Declaration of Kellie C.

Exhibit 17 Declaration of Robert Roe

Exhibit 18 Declaration of Yvonne Yoe

Exhibit 19 Declaration of John Noakes

Exhibit 20 Declaration of Jamie Reed

Dated: May 19, 2023

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on May 19, 2023, the undersigned filed the foregoing documents via this Court's electronic filing system or in person pursuant to Administrative Order No. 205. Notice of such filing has been sent to the following counsel of record:

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